

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBRA RICHMOND-PROHASKA,

Plaintiff,

v.

ETHICON, INC., and ETHICON, LLC,

Defendants,

Case No. 2:23-cv-00210-JLR

**STIPULATION TO EXTEND CASE  
SCHEDULE DEADLINES**

**Noted for Consideration: June 8, 2023**

Whereas, counsel for the Parties have conferred and agreed on extending initial case schedule deadlines (Dkt. No. 9) until after resolution of Defendants' forthcoming motion to dismiss, which Defendants will file on or before their deadline to do so on June 19, 2023.

Therefore, the Parties stipulate and agree, and jointly move this Court, for an order suspending the initial case schedule deadlines in this matter (Dkt. No. 9), including deadlines for the Fed. R. Civ. P. 26(f) Conference, Initial Disclosures, and the Joint Status Report, until after the Court's decision on the forthcoming Motion to Dismiss Plaintiff's Amended Complaint. The interests of judicial economy are best served if the Parties do not proceed with prosecuting their claims and/or defenses while the potential of dismissal of this action is unresolved. Within 21 days of the Court's order on the forthcoming Motion to Dismiss, the Parties shall confer and propose

new deadlines—if applicable—for the Fed. R. Civ. P. 26(f) Conference, Initial Disclosures, and the Joint Status Report.

*IT IS SO STIPULATED.*

Dated: June 8, 2023.

Respectfully submitted,

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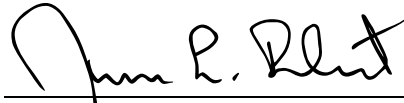
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*Counsel for Plaintiff*

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED: June 9, 2023



The Honorable James L. Robart  
UNITED STATES DISTRICT JUDGE